

# HALL BOWERS

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January 25, 2012

## VIA HAND-DELIVERY

Jocelyn G. Boyd, Esquire  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

**COPY**  
**Posted:** led  
**Dept:** S.A  
**Date:** 1/26/12  
**Time:** 10:15

KEVIN A. HALL  
kevin.hall@hallbowers.com  
KARL S. (BUTCH) BOWERS, JR.  
butch.bowers@hallbowers.com  
TODD CARROLL  
todd.carroll@hallbowers.com  
PUBLIC SERVICE  
COMMISSION  
JAN 25 PM 4:01  
RECEIVED

RE: Annual Review of Base Rates for Fuel Costs of South Carolina Electric and Gas  
Company, Docket No. 2012-2-E

Dear Ms. Boyd:

Enclosed for filing please find the original and ten (10) copies of the Petition to Intervene of CMC South Steel Carolina in the above-referenced matter. I have also enclosed two extra copies of the Petition. Please file stamp the extra copies and return them to me via courier. By copy of this letter, I am serving all parties of record. If you have any questions or need additional information, please do not hesitate to contact me.

With kind regards, I am

Very truly yours,

  
Kevin A. Hall

cc: All Parties of Record

RETURN DATE: 1/25/12 ok  
SERVICE: ok led

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

Annual Review of Base Rates for Fuel Costs                    )  
of South Carolina Electric & Gas Company                    )     Docket No. 2012-2-E

SOUTH CAROLINA  
PUBLIC SERVICE  
COMMISSION

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**PETITION TO INTERVENE OF CMC STEEL SOUTH CAROLINA**

CMC Steel South Carolina ("CMC") hereby petitions to intervene in the above-captioned proceeding. CMC states the following grounds in support of its petition.

1)     CMC owns and operates a steel manufacturing facility in Cayce, South Carolina. This facility utilizes an electric arc furnace ("EAF") to melt and recycle steel. This process requires CMC to purchase very large quantities of electricity from South Carolina Electric & Gas Company ("SCE&G") at a cost of millions of dollars a year. Because the cost of electricity is one of the major costs of steel-making utilizing an EAF, the cost of electric power directly affects CMC's ability to produce steel at a competitive price. CMC is one of the largest retail customers of SCE&G.

2)     Due to the magnitude and unique characteristics of its load, CMC cannot be adequately represented by any other party to this proceeding. At this stage of the proceeding, CMC has not fully determined what positions it may take.

3)     CMC's mailing address is:

CMC Steel South Carolina  
310 New State Road  
Cayce, SC 29033

4)     CMC is represented by the Washington, D.C. law firm of Brickfield, Burchette, Ritts & Stone, P.C. in various matters regarding electric rates and service. In the past few years, attorneys of the firm have appeared before this Commission, the Federal Energy Regulatory Commission, and many other state utility commissions. In accordance with Rule 103-804

S.(1)(b) of the Commission's Rules of Practice and Procedure, Brickfield, Burchette, Ritts & Stone, P.C. will associate with Kevin Hall of Hall Bowers, LLC, 1727 Hampton Street, Columbia, SC 29201, local counsel licensed to practice in South Carolina. Service and correspondence regarding this proceeding should be sent to all of the undersigned.

WHEREFORE, for the reasons set forth above, CMC respectfully requests permission to intervene in this proceeding.

Respectfully submitted,



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Damon E. Xenopoulos, Esq.  
BRICKFIELD, BURCHETTE, RITTS & STONE, P.C.  
1025 Thomas Jefferson Street, N.W.  
Eighth Floor -- West Tower  
Washington, D.C. 20007  
(202) 342-0800

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*Attorneys for CMC Steel South Carolina*

**BEFORE THE  
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

**Docket No. 2012-2-E**

**In RE:**

**Annual Review of Base Rates for Fuel**

**Costs of South Carolina Electric and Gas  
Company**

**CERTIFICATE OF SERVICE**

This is to certify that I have caused to be served this day a copy of the *Petition to Intervene of CMC Steel South Carolina* via first-class mail, postage pre-paid, to the persons named below at the addresses set forth below:

Jeffrey M. Nelson, Counsel  
Office of Regulatory Staff  
1441 Main Street, Suite 300  
Columbia, SC 29201

K. Chad Burgess, Senior Counsel  
South Carolina Electric and Gas Company  
1426 Main Street, MC 130  
Columbia, SC 29201

Mitchell Willoughby, Esq.  
Willoughby & Hoefer, P.A.  
P.O. Box 8416  
Columbia, SC 29202

Scott Elliott, Esq.  
Elliott & Elliott, P.A.  
721 Olive Street  
Columbia, SC 29205

SC PUBLIC SERVICE  
COMMISSION

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